

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

FEDERAL TRADE COMMISSION,

Plaintiff,

v.

IQVIA HOLDINGS INC.,

and

PROPEL MEDIA, INC.,

Defendants.

Case No. 1:23-cv-06188-ER

**DECLARATION OF DAVID J.
FIOCCOLA IN SUPPORT OF
MOTION TO WITHDRAW AS
COUNSEL OF RECORD**

I, David J. Fioccola, hereby declare:

1. I was a partner with the law firm of Morrison & Foerster LLP. Pursuant to Local Civil Rule 1.4 through October 6, 2023. Effective October 16, 2022, I am no longer be associated with Morrison & Foerster LLP.

2. I submit this declaration in support of the motion to withdraw my appearance as counsel of record for defendant Propel Media, Inc. from this action.

3. Defendants will continue to be represented by, Alexander Okuliar, David J. Shaw, Michael Miller, Alexa Rae DiCunzolo, Evan M. Harris, Andrew J. Molina, Kevin Wang, Richelle Gernan and Mika M. Fitzgerald of Morrison & Foerster LLP.

4. Fact discovery is ongoing, and the evidentiary hearing begins on November 20th. This withdrawal is not being requested for the purpose of delaying this proceeding.

5. I certify that my withdrawal will not cause or result in any delay or prejudice. I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 13, 2023
New York, NY

By: /s/ David J. Fioccola
David J. Fioccola